



Lennon,
Murphy &
Lennon, LLC

ATTORNEYS AT LAW

The GrayBar Building
420 Lexington Ave., Suite 300
New York, NY 10170
phone (212) 490-6050
fax (212) 490-6070
www.lennmur.com

Tide Mill Landing
2425 Post Rd. Suite 300
Southport, CT 06890
phone (203) 256-8500
fax (203) 256-8515
mail@lennmur.com

August 20, 2008

Via Facsimile (212) 805-7906

Hon. Denny Chin
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 1020.
New York, New York 10007-1312

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/25/08

Re: Jakil S.P.A. v. Agrimpex Co. Ltd.
Docket No.: 08 CV 5613 (DC)
Our Ref. No.: 1543-08

Dear Judge Chin:

This office represents the Defendant, Agrimpex Co., Ltd. ("Defendant") in the above referenced action. Plaintiff Jakil S.P.A. ("Plaintiff") is represented by George M. Chalos of Chalos & Co.

This is an admiralty action brought pursuant to Supplemental Admiralty Rule B of the Federal Rules of Civil Procedure ("Rule B"). On or about June 20, 2008, Plaintiff filed its Verified Complaint seeking to attach funds up to the amount of \$6,297,354.00 belonging to Defendant to secure and satisfy the Plaintiff's claims.

On or about August 4, 2008, Defendant received notice of Plaintiff's maritime attachment from Plaintiff's counsel, advising it that funds in the amount of \$1,829,901.45 had been attached at BNP Paribas pursuant to the writ of attachment issued in this matter. Agrimpex denies that it has a property interest in these funds being held at BNP Paribas.

On August 20, 2008, Defendant filed a Notice of Restricted Appearance. Defendant now seeks to vacate the maritime attachment pursuant to Supplemental Rules of Admiralty Rule E(4)(f) and to dismiss Plaintiff's Verified Complaint pursuant to Rule 12(b)(6).

Counsel for both parties have conferred on the issues and jointly respectfully request that Your Honor waive the requirement of a pre-motion conference. Counsel for both parties have also agreed on the following briefing schedule for Defendant's E(4)(f) application and respectfully request that your Honor approve and endorse same:

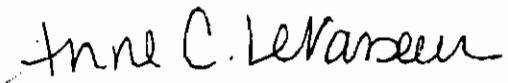
- Approved.
No PMC is
required.
so ORDERED,*
- Defendant's Motion to Vacate Maritime Attachment be filed on or before Friday, August 22, 2008;
 - Plaintiff's Opposition to Defendant's Motion to Vacate Maritime Attachment be filed on or before Monday, September 8, 2008;
 - Defendant's Reply, if any, be filed and served on or before September 15, 2008; and

[Signature] 8/25/08
msd

- Oral argument scheduled thereafter at any day and time convenient to the Court.

We thank the Court in advance for its consideration of this request. We are available to discuss our request at any time convenient to the Court.

Respectfully submitted,


Anne C. LeVasseur

ACL/bhs

cc: Via Facsimile 866-702-4577
George M. Chalos
Chalos & Co.
Attorneys for Plaintiff
Jakil S.P.A.
123 South Street
Oyster Bay, New York 11771